

To: Vaughn, Stephanie[Vaughn.Stephanie@epa.gov]
Cc: betsy.ruffle@aecom.com[betsy.ruffle@aecom.com]; Willard Potter[otto@demaximis.com]; William Hyatt[william.hyatt@klgates.com]
From: Robert Law
Sent: Fri 6/5/2015 9:32:07 PM
Subject: Re: Draft BHHRA, Comments

Stephanie:

1. On behalf of the CPG, this acknowledges receipt of the 17-mile BHHRA comments received this afternoon.

2. Your email states that the 60-day clock to deliver a revised BHHRA started upon receipt of the comments this afternoon. It would seem that the 60-day clock should start when at a minimum all of the following actions are complete:

1. Surrogate analysis referenced in Comments 5, 50, 86c, 87 and 153 is provided to the CPG - promised on June 8.
2. Information promised for BERA Comment 6 is provided to the CPG - week of June 8(?)
3. Resolution of BERA Comments 11, 13, 51 and 52 detailed in the CPG's May 29 letter is finalized - Region 2 is currently reviewing

3, As agreed during our June 1 teleconference, the next Region 2-CPG teleconference to discuss the BHHRA and BERA is scheduled for June 15 at 2 PM EDT.

Please contact me with any questions.

Thank you.

R/
Rob

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>>> "Vaughn, Stephanie" <Vaughn.Stephanie@epa.gov> 6/5/2015 3:07 PM >>>
Hi Rob,

Attached are EPA's comments on the draft Baseline Human Health Risk Assessment (BHHRA) submitted by the CPG in June 2014. As you will see, the comments are lengthy and the next version of the draft BHHRA will require a complete and thorough review by EPA and the partner agencies. Several of the general comments affect the entire document, so significant revisions will be necessary to nearly every section of the report.

In accordance with Section X, Paragraph 46 of the AOC, you have up to 60 days to submit a revised draft BHHRA for EPA's full review, as well as a detailed response to comments. Please

keep in mind that if the next draft of the document is highly deficient, EPA may elect to modify the document itself pursuant to Paragraph 44 of the AOC, and, as per Paragraph 47 of the AOC, the CPG would be required to accept the findings of the modified report (subject to dispute resolution).

Please note that I will send the attachments related to surrogate analysis on Monday. I have them, but just want to verify with Marian Olsen that I have the complete and final set of reports.

As with the draft BERA, it would be beneficial for us to discuss these comments prior to submittal of a response to comments. Please let me know if you have any questions.

Thank you,
Stephanie
212-637-3914